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December 30, 2019

Hon. Brian M. Cogan - VIA CM/ECF  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: Avail Holding LLC - Ramos  
Docket No. 19-cv-00117

Dear Judge Cogan:

My firm represents the plaintiff-appellant, Avail Holding LLC, on Avail's appeal from the judgment entered in this matter. Avail seeks to post a bond in order to stay the enforcement of the judgment as well as defendant's motion for attorney's fees, pending the appeal. I conferred with defendant's attorney, Christopher Newton, Esq. and suggested that a bond of \$40,000 would be more than enough to cover any attorney's fees currently owed as well as any attorney's fees that could potentially be owed as a result of the appeal. Mr. Newton told me that I could represent to this court that he did not intend to oppose this application.

If necessary, plaintiff is prepared to file a motion seeking relief pursuant to FRCP 62(b) and/or 62(d), and hereby seeks permission to make such a motion. However, as there is general agreement on the matter, it is respectfully requested that the court issue an order, in the form of the order annexed.

Very truly yours,



GLENN P. WARMUTH/swi

cc: Christopher Newton, Esq. (via CM/ECF)

Alan H. Weinreb, Esq. (via CM/ECF)

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